

EXHIBIT A

DECLARATION OF HANNAH M. SMITH

1. I am an attorney admitted to practice before this Court, an attorney in the law firm of Shook, Hardy & Bacon, LLP, and local counsel for Defendant Hanna Holdings, Inc. I submit this declaration in support of Defendant Hanna Holdings, Inc.'s Letter to the Court dated April 18, 2025. I have personal knowledge of the matters set forth in this declaration and, if called upon, could testify competently thereto.

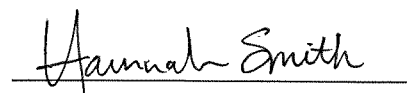
2. I did not attend the *Burnett* settlement conference on May 9, 2024.

3. I spoke with Rob Adams and Mike Cargnel, also attorneys in the law firm of Shook, Hardy & Bacon, LLP, and counsel for Defendant Hanna Holdings, Inc., who both confirmed they did not attend the *Burnett* settlement conference on May 9, 2024.

4. I also reviewed the time entries for time billed to this client for work performed during May 2024 and did not find any entries for work performed in the Month of May 2024.

5. On March 26, 2025, I sent an email to all attorneys at Shook, Hardy & Bacon, LLP requesting a response if any attorney recalled being present at the settlement hearing for *Burnett v. National Association of Realtors, et al.* (19-CV-00332-SRB). As of April 18, 2025, no attorney responded to my email that they were present for the hearing.

6. On April 14, 2025, I sent another email to attorneys in Shook's Kansas City and St. Louis offices requesting a response if any attorney recalled being present at the WDMO courthouse on May 9, 2024. As of April 18, 2025, no attorney responded to my email that they were present.



Hannah M. Smith